

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MEGALOMEDIA, INC., et al.**

**Plaintiffs,**

**v.**

**PHILADELPHIA INDEMNITY  
INSURANCE COMPANY**

**Defendant.**

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**Civil Action No. 4:20-cv-01644**

**DEFENDANT’S MOTION TO RESET STATUS CONFERENCE**

This matter was tried to this Court in early 2023 and appealed to the Fifth Circuit. In September 2024, after the appeal was fully briefed, the Fifth Circuit remanded the case to this Court for the purpose of conducting jurisdictional discovery. (ECF No. 140.) After the remand, Megalomedia’s counsel filed a Motion to Withdraw. (ECF No. 142.) The Court granted the Motion to Withdraw on October 25, 2024 and stayed the case for 30 days to give Megalomedia an opportunity to find new counsel. (ECF No. 144.) The 30-day stay expires on November 25, 2024, and no counsel have made an appearance on behalf of Megalomedia as of the date of this Motion.

The Court set a status conference for December 5, 2024. (ECF Nos. 145.) Counsel for Philadelphia, Stephen A. Melendi and Matthew Rigney, will be attending a continuing legal education seminar in New York December 2 through December 6. Therefore, Philadelphia requests that the Court reset the status conference one week later, to December 13, 2024, or another date convenient for the Court.

WHEREFORE, Philadelphia prays that the Court grant this Motion and reset the status conference to December 13, 2024 or another date after December 6, 2024 that is convenient for the Court.

Respectfully submitted,

/s/ Stephen A. Melendi

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**ATTORNEYS FOR DEFENDANT**

**PHILADELPHIA INDEMNITY INSURANCE**

**COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2024, a true and correct copy of the foregoing was served on Jonathan Nowzaradan via email to [jon@megalomedia.com](mailto:jon@megalomedia.com) and via U.S. Mail to 5300 Bee Cave Road, West Lake Hills, TX 78746.

/s/ Stephen A. Melendi

Stephen A. Melendi